

**REMARKS**

The Office action dated June 4, 2003 and the cited references have been carefully considered.

**Status of the Claims**

Claims 1-29 and 46-51 are pending. Claim 50 is canceled. Therefore, claims 1-29, 46-49, and 51 remain in the current prosecution.

Claims 4-29 are allowed. The Applicants wish to thank the Examiner for indicating that claims 4-29 are allowed.

Claims 1-3 and 46-51 are rejected under 35 U.S.C. § 102(e) as being anticipated by Singh (U.S. Patent 6,259,838 B1). The Applicants respectfully traverse this rejection for the reasons set forth below.

**Claim Rejection Under 35 U.S.C. § 102**

Claims 1-3 and 46-51 are rejected under 35 U.S.C. under 35 U.S.C. § 102(e) as being anticipated by Singh. Claim 50 is canceled. Therefore, the rejection of this claim is now moot. The Applicants respectfully traverse the rejection of claims 1-3, 46-49, and 51 because Singh does not disclose each and every element of each of these claims.

"Anticipation requires the presence in a single prior art reference disclosure each and every element of the claimed invention, *arranged as in the claim*." *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 221 U.S.P.Q. 481, 485 (Fed. Cir. 1984) (emphasis added).

Singh discloses light-emitting elements that are connected electrically only in parallel. In contradistinction, claims 1-3, 46-49, and 51 recite a plurality of organic light emitting diode modules electrically connected in series.

Although Singh's light-emitting elements are arranged physically one after another, they are not electrically connected in series, as is recited in claims 1-3, 46-49, and 51. For

example, Figure 4 clearly shows that Singh's light-emitting elements are electrically connected in parallel because each is electrically independent from the others; i.e., there is no electrical connection between the first electrode (120) of one element (e.g., pixel p1) and the second electrode (140) of the next element (e.g., pixel p2). In addition, Singh discloses a display comprising a plurality of independently addressable elements. Such independently addressable elements of a display cannot be electrically in series because elements electrically connected in series are activated or deactivated all at the same time.

For example, Singh describes, at lines 60-62 of column 3, "[s]uch [optical or electrical] signal includes information for addressing particular ones of the light-emitting elements 150 . . ." (Emphasis added.) If Singh's elements were electrically connected in series, Singh would not be able to address particular light-emitting elements because all of the light-emitting elements would be powered at the same time by virtue of electrical connections between a first electrode of one element and a second electrode of the next element.

Singh further describes another embodiment, at lines 18-21 of column 9, "[d]etector 180 is responsive to the appropriate FM frequency by either having an electrical switching action that selectively applies potential from one of conductive buses 160 to one of contacts 120, 140 . . ." (Emphasis added.) Furthermore, at lines 32-35 of column 9, Singh discloses "[w]hen the frequency signal to which a particular detector 180 is responsive is present, detector 180 responds thereto to turn on the particular pixel associated therewith . . ." (Emphasis added.) It is clear that Singh's elements are connected electrically in parallel because only in such an arrangement can a particular element be independently activated.

Since Singh does not disclose light-emitting elements electrically connected in series, and thus does not disclose each and every elements of each of claims 1-3, 46-49, and 51, Singh does not anticipate these claims.

In view of the above, it is submitted that the claims are patentable and in condition for allowance. Reconsideration of the rejection is requested. Allowance of claims at an early date is solicited.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Toan P. Vo". The signature is written in a cursive, flowing style. Below the signature is a horizontal line.

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